

November 17, 1997

Colonel J. M. Wonsik
District Engineer
St. Paul District, U.S. Army Corps of Engineers
Army Corps of Engineers Centre
190 Fifth Street East
St. Paul, MN 55101-1638

RE: Crandon Mine Project: 94-01298-DLB

Dear Colonel Wonsik:

I have read with great interest the letter addressed to you from Ms. Janet Smith, U.S. Fish and Wildlife Service (FWS), dated October 31, 1997 regarding her request for additional data to support a baseline for biological monitoring for the Crandon Mine Project. As you are probably aware, the U.S. Environmental Protection Agency (EPA) has been meeting with Joel Trick, FWS, regarding biological baseline data needs, and that the Tribes involved in this project have also been advocating for further study with regard to biological baseline studies.

EPA supports the FWS request and believes that the hydrology and hydraulic model (HSPF Surface Water model), initiated by the EPA, works towards this concern. The output of the HSPF model would be able to be used by biologists and ecologists, such as those from FWS, EPA, COE and COE-Waterways Experiment Station (WES), the Tribes, and other parties to determine potential impacts (based on a baseline determination) to aquatic resources and populations and will assist in determining mitigation measures needed to minimize these impacts.

The entire focus and advantage of using the HSPF model is to enhance and strengthen any other modeling done thus far by having biological and ecological impacts assessed in relation to our model outputs. The value of the biological links for assessing the outputs and the impact to the biological community cannot be overstated in its importance as being part of the Environmental Impact Statement. If any aspect of this assessment is decreased, the value of the modeling effort with the critical link to the biota also is diminished. Therefore, it is imperative that your participation continue through the COE involvement with COE-WES and FWS as much as possible. EPA is eager to work with the FWS, COE and COE-WES in promoting this issue. We hope that the COE agrees to this need and is able to provide appropriate staff time and resources from the District office and from COE-WES to support the development of this study. The EPA, as a federal agency, understands potential fiscal difficulties related to this effort, but we strongly encourage this effort to be given a high priority, to enable everyone to provide effective assessment and a viable work product for all concerned now and in the future. Together, the EPA, FWS, COE, Wisconsin Department of Natural Resources, interested Tribes, the Great Lakes Indian Fish and Wildlife Commission and other interested parties, along with the Crandon Mining Company, should be capable of producing guidelines and/or a workplan that will enable a biological baseline to be developed and to initiate field work in the Spring of 1998, well before construction activities would be scheduled to begin if the permits are granted.

Again, EPA is willing to assist the FWS and the COE in this matter. If you would like to discuss

this issue further, please contact me at 312-886-7252.

Sincerely,

Daniel J. Cozza
Crandon Mine Project Manager
U.S. Environmental Protection Agency

cc:

J. Smith, FWS
J. Trick, FWS
D. Ballman, COE
A. Ternes, NPS
H. Nelson, BIA
J. Coleman, GLIFWC
A. McCammon Soltis, GLIFWC
J. Griffin, Mole Lake
D. Cox, Menominee
K. Fish, Menominee
C. Hansen, FCP
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W. Tans, WDNR
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